

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 22-180 (JNE/TNL)

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 v.) GOVERNMENT'S
) PROPOSED VOIR DIRE
 ANTHONY LEE HITCHCOCK,)
)
 Defendant.)

The United States of America, by and through its counsel, Andrew M. Luger, United States Attorney for the District of Minnesota, and Assistant United States Attorney Thomas Calhoun-Lopez, respectfully requests the Court to inquire of the jury panel, in accordance with the procedures set forth in Rule 24(a), Federal Rules of Criminal Procedure, as follows:

Basic Background

1. What is your name? Over the past five years, where have you resided and what has been your occupation? Provide the same information for your spouse or partner. If either you or your spouse or partner are retired, what was your and your spouse's or partner's occupation before retiring? If you have children, how many and what are their ages?

2. What is your educational background? What is your spouse or your partner's educational background?

3. What newspapers or magazines do you read on a regular basis?

From what sources do you usually obtain or follow the news?

4. Do you have any favorite hobbies or activities? If so, what are they?

5. Do you belong to any organizations or groups? If so, what are they? Do you hold a position or have any duties within the organization or group? If so, what are they?

6. Do you regularly watch any law-related programs on television (such as CSI, Law & Order, etc.)? Which ones? Based on the programs you watch, have you formed an opinion of the type of evidence necessary for the Government to satisfy its burden of proof? If so, can you put those opinions aside and decide the case on the evidence presented in the courtroom during the course of this trial?

Knowledge of the Case and Case Participants

7. Have you heard of this case before today? If so, when, and how?

8. Are you acquainted with the defendant, Anthony Lee Hitchcock; the defendant's stand-by attorney, George R. Dunn; the Government's attorneys, Assistant United States Attorney Tom Calhoun-Lopez; or the case agent, Special Agent Danelle Bates of the Bureau of Alcohol, Tobacco, Firearms and Explosives?

9. Are you acquainted with any of the other prospective jurors? If so, how?

10. Are you acquainted with Judge Erickson or her court staff?

Previous Jury Service

11. Has anyone previously served as a juror on a case? How many?

12. Was the prior case a criminal or civil matter? What was the nature of the case?

13. Was the prior case in federal or state court?

14. In that prior case, were you able to reach a verdict? Were you the foreperson?

15. Was there anything about your previous jury experience that would lead you to feel that you may have some prejudices either for or against the prosecution or the defense?

Previous Contact with the Criminal Justice System

16. Have you, your relatives, close friends, or neighbors ever been involved in law enforcement, such as a police officer, deputy sheriff, federal agent, or prosecutor?

17. If so, is there anything about your experience or relationship with these individuals that would affect your approach to this case?

18. Do you have any legal training? Have you taken any law-related courses?

19. Do you have any relatives, close friends, or neighbors who are lawyers, judges, or are employed in another job within the legal profession?

20. Have you ever testified in court? Is there anything about that experience that would affect your approach to this case?

21. Have you or any member of your family had any type of encounter with the Minneapolis Police Department, the Minnesota Bureau of Criminal Apprehension, the Bureau of Alcohol, Tobacco, Firearms and Explosives, or any other law enforcement agency? What was the nature of the encounter? Were you satisfied with the manner in which the matter was resolved? Why or why not?

22. Some of the witnesses in this trial are likely to be law enforcement officers. Do you have any strong prejudices either against or in favor of law enforcement officers? If so, what are they?

23. Have you, your relatives, close friends, or neighbors ever been a victim of a crime? Do you believe that law enforcement officials and the court properly handled the matter? Would your judgment in this case be affected in any way by that experience?

24. Have you, your relatives, close friends, or neighbors ever been accused, investigated, charged with, or convicted of a crime? Do you believe that law enforcement officials and the court properly handled the matter?

Case Specific

25. Do any of you have such strong feelings, one way or the other, about our nation's gun laws that would make it difficult for you to be a fair and impartial juror in this case?

26. More specifically, are any of you opposed to federal, state and/or local laws making it illegal for a person who has been convicted of a felony (that is, a crime punishable by a term of imprisonment exceeding one year) to possess a firearm?

27. Have you or any of your close friends or relatives ever participated in or belonged to any organization which advocates for or against gun laws? If not, do you agree with the beliefs of any such organizations? If you are selected as a juror, will those views play any role in your decision in this case?

28. The defendant in this case has decided to represent himself in this trial and not to use the services of a lawyer. He has a constitutional right to do that. You will be instructed that this decision must not affect your consideration and your decision whether or not he is guilty or not guilty. If you are selected as a juror, will you follow that instruction?

Service as a Juror

29. Do you have any disagreement or issue with the operation of the criminal justice system in the United States? Do you have any disagreement or issue with the full enforcement of federal, state, and/or local laws of the criminal justice system in the United States?

30. If selected as a juror in this case, will you apply the law as given by the Court, regardless of whether you agree or disagree with it?

31. Do you believe that there are certain crimes that should be legalized? If so please explain your answer.

32. Do any of you have any moral, religious, philosophical, or other beliefs or tenets that would make it particularly difficult for you to sit in judgment of another?

33. Do you have any religious or philosophical convictions that would make it difficult for you to be a fair and neutral juror in this case?

34. Do you have any mental or physical conditions that would make it difficult for you sit as a juror?

35. Do you have any difficulties understanding the English language?

36. Based upon the discussions you have heard during voir dire, is there any reason why you feel you cannot be a fair and impartial juror in this case?

Dated: March 29, 2023

Respectfully submitted,

ANDREW M. LUGER
United States Attorney

/s/ Thomas Calhoun-Lopez
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Assistant United States Attorneys
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